REMARKS

This is a full and timely response to the non-final Office action mailed June 27, 2005. Reexamination and reconsideration in view of the foregoing amendments and following remarks is respectfully solicited.

Claims 10-18 and 35 are now pending in this application, with Claims 10, 18, and 35 being the independent claims. Claims 10, 13, 16, and 35 have been amended and Claims 1-9 and Claims 19-34 have been canceled herein. No new matter is believed to have been added. It is noted that Claims 13 and 16 were amended merely to correct a typographical spelling error.

Rejections Under 35 U.S.C. § 103

Claims 1-6, 8-14, 16-17, and 35 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2003/0126233 A1 (Bryers et al.) in view of U.S. Patent No. 5,193,197 (Thacker), and Claims 7, 15, and 18 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Bryers and Thacker, and further in view of U.S. Patent No. 5,984,080 (Baker). These rejections are respectfully traversed.

Independent Claims 10, 18, and 35 each relate to methods, or a computer-readable medium containing code that causes a computer to implement a method, of modifying an entry in a security association database in a system having a plurality of channels. The claimed methods each include retrieving a security association data structure from a predetermined address location, modifying the retrieved security association data structure, and writing the modified security association data structure to the predetermined address location in the security association database, and each of the independent claims recites, *inter alia,* requesting access to a predetermined address location in the security association database, assigning a weight value to the request based on a sequential order of the request relative to access requests to the predetermined address location made by other of the security channels. Moreover, each of the independent claims now makes clear that the security association data structure is

retrieved from the predetermined address location when, based on the weight value assigned to the request, the requesting channel has the highest priority.

Bryers et al. relates to a system and method for controlling a content services aggregator and discloses, at various portions of the disclosure, the known method of retrieving an SA data structure, modifying the SA data structure, and writing the modified SA data structure to the SAD. Indeed, Bryers et al. discloses what Applicants disclose in the background portion of the instant application. Although the Office action alleges that Bryers et al., in paragraphs [0178] – [0183], discloses assigning a weight value to a request based on a sequential order of the request relative to access requests to the same SAD address location made by other channels, this is simply not the case. Rather, what Bryers et al. discloses in these paragraphs is how their invention determines a set of distributed target bandwidths for a plurality of traffic classes, to thereby allow the content aggregator to provide bandwidth guarantees for the system as a whole. Traffic classes are predefined, and when packets arrive each is classified to determine in which traffic class it belongs.

It is thus clear that Bryers et al. fails to disclose, or even remotely suggest at least the above-noted feature of independent Claims 10, 18, and 35. Namely, this reference fails to disclose or suggest at least assigning a weight value to the request based on a sequential order of the request relative to access requests to the predetermined address location made by other of the security channels. Indeed, this is, in the first instance, why the Office action relied upon Thacker for a teaching of determining whether another of multiple channels has a higher priority. For, if Bryers et al. does not disclose this feature, which Applicants readily agree with, there is no need whatsoever for the system of Bryers et al. to assign a weight value to requests, which is probably why it does not.

Turning now to Thacker, which, as was just noted, was relied upon in the Office action as teaching determining whether another of multiple channels has a higher priority, Applicants wish to point out that this reference does teach this general methodology, but does not teach or suggest the methodology that is now recited in each of the independent claims. In particular, Thacker discloses an arbitration apparatus that includes a highest active priority determination unit (21), a local priority register (25), and a comparator unit

(24). The highest active priority determination unit (21) determines which of a plurality of priority signal paths has the highest active signal. The local register (25) stores a signal representative of the priority level of the associated processing unit. The comparator unit (24) compares the contents of the highest active priority determination unit (21) and the local register unit (25) and, if the values are equal, a GRANT signal is asserted for the associated processing unit. If the values are unequal, the value in the register unit (25) is incremented.

From the above, it is clear that arbitration apparatus determines priority based the priority level signal paths that are requesting access to a processing unit, and not on the order in which a request to the processing unit is received. Thus, if an access request from on a higher priority signal path arrived after a request from a lower priority signal path, and before the lower priority signal path was granted access, then the access request from the higher priority signal path would be granted before the request from the lower priority signal path. This is wholly opposite to the method recited in independent Claims 10, 18, and 35.

In view of the foregoing, Applicants submit that the combination of Bryers et al. and Thacker fail to disclose, or even remotely suggest, at least the inventions encompassed by independent Claims 10, 18, and 35.

As regards Baker, which was cited as allegedly teaching the step of determining whether a write buffer is busy, Applicants submit that this reference fails to make up for at least the above noted deficiencies of Bryers et al. and Thacker with respect to independent Claims 10, 18, and 35.

In view of the above, Applicants respectfully request reconsideration and withdrawal of each of the § 103 rejections.

Conclusion

Based on the above, independent Claims 10, 18, and 35 are patentable over the citations of record. The dependent claims are also submitted to be patentable for the reasons given above with respect to the independent claims and because each recite

features which are patentable in its own right. Individual consideration of the dependent claims is respectfully solicited.

The other art of record is also not understood to disclose or suggest the inventive concept of the present invention as defined by the claims.

Hence, Applicant submits that the present application is in condition for allowance. Favorable reconsideration and withdrawal of the objections and rejections set forth in the above-noted Office Action, and an early Notice of Allowance are requested.

If the Examiner has any comments or suggestions that could place this application in even better form, the Examiner is requested to telephone the undersigned attorney at the below-listed number.

If for some reason Applicant has not paid a sufficient fee for this response, please consider this as authorization to charge Ingrassia, Fisher & Lorenz, Deposit Account No. 50-2091 for any fee which may be due.

Respectfully submitted,

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